

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL BIRDSONG, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ROCK-IT CARGO USA LLC,

Defendant.

Case No. 2:23-cv-03073-JFM

Judge John F. Murphy

STIPULATION FOR VOLUNTARY DISMISSAL WITHOUT PREJUDICE

The parties, by and through their undersigned counsel, and pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), hereby stipulate to Plaintiffs' dismissal of their claims against Defendant without prejudice in this matter, with each party to bear its own costs and attorneys' fees, subject to the Parties' agreement resolving this matter.

Dated: February 9, 2024

Dated: February 9, 2024

By: /s/ Raina C. Borrelli

Raina C. Borrelli (*pro hac vice*)
Samuel J. Strauss (*pro hac vice*)
TURKE & STRAUSS LLP
613 Williamson St., Suite 201
Madison, Wisconsin 53703-3515
Telephone: (608) 237-1775
Facsimile: (608) 509-4423
raina@turkestrauss.com
sam@turkestrauss.com

By: /s/ Richard M. Haggerty, Jr.

Richard M. Haggerty, Jr.
MULLEN COUGHLIN LLC
1275 Drummers Lane, Suite 302
Wayne, PA 19087
Telephone: (267) 930-1594
rhaggerty@mullen.law

Attorneys for Defendant

Patrick Howard
SALTZ MONGELUZZI BARRETT
& BENDESKY
1650 Market Street, 52nd Floor
Philadelphia, PA 19103

Telephone: (215) 575-3895
phoward@smbb.com

*Attorneys for Plaintiff and the
Proposed Class*

CERTIFICATE OF SERVICE

I, Raina C. Borrelli, hereby certify that on February 9, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED this 9th day of February, 2024.

TURKE & STRAUSS LLP

By: /s/ Raina C. Borrelli

Raina C. Borrelli
raina@turkestrauss.com
TURKE & STRAUSS LLP
613 Williamson St., Suite 201
Madison, WI 53703
Telephone: (608) 237-1775
Facsimile: (608) 509-4423